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July 17, 2015

## VIA ECF

Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Rm. 1105  
New York, New York 10007

Re: *Grossman Enterprises LLC v. Condé Nast, a division of Advance Magazine Publishers Inc., Condé Nast Entertainment LLC, Discovery Communications, LLC, and True Entertainment, LLC*  
No. 15-cv-4785 (JMF)

Dear Judge Furman:

We represent defendant True Entertainment, LLC ("True") in the above-referenced action. We submit this letter motion pursuant to Your Honor's Individual Practices to request an extension of time for True to answer, move or otherwise respond to the complaint filed in this action to August 11, 2015.

The original date for defendant True to respond to the complaint is Monday, July 20, 2015. This is the first request for an extension made by True or any of the defendants. The reason for the request is that the parties are engaged in negotiations to settle the matter and are optimistic that they will be able to conclude a settlement agreement in the next few weeks. We have consulted with counsel for plaintiff Grossman Enterprises LLC, who consents to the proposed extension of time on the condition that all of the defendants (1) consent to service and (2) waive any defenses related to service. We have consulted with True and counsel for each of the other named defendants and all of the defendants consent to plaintiff's conditions. Service of the complaint on defendants Condé Nast, a division of Advance Magazine Publishers Inc., Condé Nast Entertainment LLC and Discovery Communications, LLC shall be deemed completed today, July 17, 2015.


Honorable Jesse M. Furman

July 17, 2015

Page -2-

This extension will not affect any other deadline which has been set in the case, nor any hearing date. The initial pretrial conference in this matter is scheduled for September 8, 2015.

Respectfully submitted,



Maura J. Wogan

cc: John R. Cahill, Esq., counsel for Grossman Enterprises LLC (*via e-mail and ECF*)  
Leah Montesano, Esq., counsel for Discovery Communications, LLC (*via e-mail and ECF*)  
Steven A. Gaynor, Esq., counsel for Condé Nast and Condé Nast  
Entertainment LLC (*via e-mail and ECF*)